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JUN 25 2020

AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND

DEPUTY

Ronald Whitener Jr.

V

United States of America

United States District Court
for
The District of Maryland

Case Number

Motion:

To Be Released Due To Covid-19 to Halfway House or Home Detention

Now comes the defendant Ronald Whitener Jr Attorney Mr. Mark Van Bavel Ask for This court to Amend the defendants sentence from 30-37 months to Halfway House or Home Detention pre-Release, There is A National Health pandemic That is CoRonavirus-19 that is Affecting the Local, States, And Federal prison in a devastating way where hundreds are being Affected Because of not being Able to social distance. Especially for people with health problems such as the defendant with Long term having Seizures and Allergies. CDC states second wave in the winter will be worse so worse. The defendant has 2 years of Incarceration in on his plea of Guilt. With The Defendant pled Guilty last year which was 2019 and Hasnt Been sentenced yet which he wishes to be done so He may move forward with his life. The defendant has A Great family support and Letters to support of that from A lot of his family members and friends. CDF Jail has made set dates for covid-19 testing due to A secret Inmate having Covid-19 or may Have Covid-19.

(2)

The defendant medical Record has been Requested for AS of NOW. The defendant is on 5 or 6 different medication's witch you will see in medical Records. This defendant Needs To Be Released on Home Detention or Halfway House To finish The Remainer of his Short Sentence That He Has.

Statement of facts:

The CDC, with Dr. Anthony Fauci put out Information to the State and Federal Government Guide lines to follow, and About those who are most vulnerable. The CDC describe Elements that those who are most effected And could be fatal if catches the Virus. (1) people over 50 (2) people who have Heart desese (3) people who have diabetes (4) Those who have High Blood presure. (5) Those who have other Chronic care deseses that effect the Immune System. The defendant has (2) of the 5 categories. The defendant is 39 years old with very Serious Seizurs that he keep having off and on, Sense April 2020 have been having very high blood presure in and out of medical trips to the CDF Hospital. The Defendant can not social distance at all from others. If This defendant was to contract the virus it be fatal By the CDC confirmation a 80% The Defendant Goes in to shock At times And Go into very serious Seizurs. His Allergies Makes it hard for him to breath At times, Allergies makes Coughs, nose Runs, and sneezing, They Are Covid-19 Symptoms So It Scars him when it happens off and on to him. Then The testing his Jail is having this month shows that People Are testing Positive for Covid-19 in Jails in Maryland.

(3)

On July of 2018 The defendant was Arrested by Baltimore City Police for A Hand Gun, the case was Give to FBI for Reasons Hes more then 50% of his time In +0 With he pled Guilty to last year 2019. Hes ^{not} Been Sentence yet and Never Had A Home Detention Hearing at All With he suppose to have one by Law. By Law The defendant has to have one and he was never gave one or offer to go up for one By the State Attorney office. The defendant wishes to have a Detention ^{Hearing} (ASAP) By Law He has to be Granted one. The Defendant has No warrants or opens Charges nor A Pass history or Record. The defendant has one Charge on his Record With he was 17 years of Age when he recieved, 12 years ago Almost 13 years ago. He's Not A Risk At All, The Defendant Lawyer was told he wouldnt Get it, there's No need for It. State Attorney office said that. The Judge suppose to make that call not them. The Defendant wishes to have A Detention Hearing (ASAP) The Defendant's Lawyer paid Lawyer will file a Covid-19 release Motion Also A motion for The Home Detention Hearing that he was never Give. Also the Defendant wishes to be Sentence to the little time that he has most of In Anyway. We hope the ~~cars~~ courts truly Look into this matter and motion the Defendant has put In to be Released to Home Detention Due to Covid-19 Then be Sentence when courts reopen or His Sentence date is set By the courts. The defendant Truly has more then half of his time In to what he Pled Guilty to, With was A whole year Ago. please write Back AS soon AS possible please and Thank you.....

(4)

Concussion

Because of the National pandemic that is effecting the Federal prison system in a serious way. Covid-19 could be fatal for this defendant if he was to be infected with this virus. Base on facts from the CDC, with The Defendants medical Health well document in medical Records. The CDC Guidelines And Recommendations, this defendant Ask Humbley, Grant this motion with all do Respect, Since incarceration, the defendants Has truly taken serious steps to prepare for successfull Release Back into his community. The Defendant Has very very strong Support Network that will truly help the defendant to be successful, with this known to the courts, This National pandemic and The defendants Health, The defendants more then 50% of his plea ID, Humbly Now Ask this court to Grant This motion And Help protect the defendants Health and safety on This National crisis. Thank you...

Respectfully Submitted

MR. Ronald Whitener JT

SID # 2786201

401 E. Madison St

Baltimore, MD 21202

Ronald Whitener Jr

5.

Statement of facts

This motion was sent To The 3 parties, Court clerk, Lawyer, and prosecutor office. Federal Systems all over ~~America~~ America is Letting Federal Inmates Go Due To covid-19 with light sentences and Non-Violent Charges Go Home on Home Detention and Halfway House. The Defendant has a light sentence he's facing A very very light sentence. The Defendant fits all of the Things The Federal Systems say for releases, Non-violent charge, Health issues, light sentence, and 2 years of the sentence In. The Defendant Has served His sentence enough He's not A Risk to The community At All nor is The community A Risk to him. There Are 7.7 million cases of This virus world wide people Are dying ^{All} over the world. This is serious very serious and The defendant is At Risk more In (CDF) Then Home or Halfway House. Please listen to this matter and Grant This motion of The defendant's Release Due To covid-19 on Home Detention or Halfway House. The Defendant does not live In a violent community he would Be In a County Away from Any Risk's of Danger and will Not be able to leave due to Home Detention. The prosecutor office will try to use He's At Risk But The defendant is Not in Any ~~any~~ Risk At All. Please Don't let The prosecutor office use That Reason To Not Grant This motion Thank you. The defendant has Great Support System and A lot of family Support system. They've All wrote letters for him for his sentence date witch He Has Ready to Show The Judge. please respon Back To This motion AS Soon AS POSSIBLE Thank you

Respectfully Submitted

Signed: ~~2786381~~ Mr. Ronald Whitener Jr
 Ronald Whitener Jr